

# **EXHIBIT A**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

STEVEN G. MILLETT and )  
MELODY J. MILLETT, on behalf of )  
themselves and others similarly )  
situated, )  
Plaintiffs, ) CIVIL ACTION FILE  
v. ) NO. 1:05-CV-02122-TCB  
EQUIFAX INFORMATION )  
SERVICES LLC and EQUIFAX )  
CONSUMER SERVICES, INC., )  
Defendants. )

---

UNOPPOSED MOTION FOR COURT ORDER

Plaintiffs Steven and Melody Millett, by and through counsel of record, file this unopposed motion for an Order from the court directing Defendant Equifax Information Services, LLC ("EIS") provide the Plaintiffs with the following information from any credit file in EIS' date base with a Social Security number that is the same as Steven Millett's Social Security number:

- 1) the name and address of each entity identified on the credit file as having an account;
- 2) the account number of each account listed on the file; and

- 3) the name and address of each entity identified on the credit file as having requested the credit file.

In support thereof, Plaintiffs state as follows:

1. Defendants do not oppose such an order.
2. Plaintiffs require this information in order to close any credit files which are or were fraudulently opened utilizing the Social Security number issued to Plaintiff Steven G. Millett ("Steven Millett").
3. Plaintiff Steven Millett was issued a Social Security number by the Social Security Administration.
4. Plaintiff Steven Millett is filing, for inspection in camera by the Court, an affidavit, under seal, which sets out his Social Security number and provides a form of identification and photographic identification (hereinafter "Affidavit"). This information is being provided to the Court for in camera review in order to protect the private information of Steven Millett pursuant to local rules and policies.
5. Mr. Millett is the known victim of identity theft. *See* Steven G. Millett Affidavit. The information about the known use of his Social Security number is necessary so that all accounts opened with his personal identification information can be closed.

This Court has authority to enter such an Order pursuant to 15 U.S.C. §1681a and 15 U.S.C. § 1681b. *See also, In re Grand Jury Proceedings*, 503 F.Supp. 9, 12 (D.C.N.J., 1980). “The production of credit reports pursuant to court order was obviously listed as permitted conduct because such material may be relevant evidence in all manner of court proceedings. Congress had no intention to invade the judicial sphere. It is of some significance that the other permitted uses listed by [Section] 1681b are all related to the normal and ordinary uses for which credit reports are prepared. The judicial use may be for entirely different purposes, and more likely is for different purposes.” Id.

Wherefore, Plaintiffs request an Order from the Court directing Defendant EIS to provide the information set forth in this Motion.

Everette L. Doffermyre  
s/ Everette L. Doffermyre  
Georgia Bar Number 224750  
DOFFERMYRE SHIELDS  
CANFIELD  
KNOWLES & DEVINE, LLC  
1355 Peachtree St., #1600  
Atlanta, GA 30309  
Tel: (404) 881-8900  
Fax: (404) 881-3007  
edoffermyre@dsckd.com

DOFFERMIRE SHIELDS CANFIELD  
KNOWLES & DEVINE, LLC  
1355 Peachtree St., #1600  
Atlanta, GA 30309  
Tel: (404) 881-8900  
Fax: (404) 881-3007  
[edoffermyre@dsckd.com](mailto:edoffermyre@dsckd.com)

BRYSON CLOON (*pro hac vice*)  
Cloon Law Firm  
11150 Overbrook Rd. Suite 350  
Leawood, KS 66211

Barry R. Grissom (*pro hac vice*)  
7270 W. 98<sup>th</sup> Terrace  
Building 7, Suite 220  
Overland Park, KS 66212

Yeager Law Firm, L.L.C.  
B. Joyce Yeager (*pro hac vice*)  
Yeager Law Firm, L.L.C.  
7270 W. 98<sup>th</sup> Terrace  
Building 7, Suite 220  
Overland Park, KS 66212  
(913) 648-6673  
(816) 221-8763 (Facsimile)  
[joyce@joyceyeagerlaw.com](mailto:joyce@joyceyeagerlaw.com)

Attorneys for Plaintiffs,  
STEVEN & MELODY MILLETT

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

STEVEN G. MILLETT and )  
MELODY J. MILLETT, on behalf of )  
themselves and others similarly )  
situated, )  
Plaintiffs, ) CIVIL ACTION FILE  
v. ) NO. 1:05-CV-02122-TCB  
EQUIFAX INFORMATION )  
SERVICES LLC and EQUIFAX )  
CONSUMER SERVICES, INC., )  
Defendants.

CERTIFICATE OF SERVICE

I hereby certify that on February 20, 2007, I electronically filed  
Plaintiffs' Motion for Court Order with the Clerk of the Court using the  
CM/ECF system which will automatically send email notification of such  
filing to the following attorneys of record:

Audra A. Dial  
A. Stephens Clay  
Craig E. Bertschi  
Cindy D. Hanson, Esq.  
KILPATRICK STOCKTON LLP  
Suite 2800, 1100 Peachtree Street  
Atlanta, Georgia 30309-4530  
Phone: (404) 815-6500  
Facsimile: (404) 541-3233  
[chanson@kilpatrickstockton.com](mailto:chanson@kilpatrickstockton.com)

*Attorneys for Defendants Equifax Consumer Services, Inc. and Equifax Information Services LLC*

s/ Everette Doffermyre  
Georgia Bar Number 224750

DOFFERMYRE SHIELDS CANFIELD  
KNOWLES & DEVINE, LLC  
1355 Peachtree St., #1600  
Atlanta, GA 30309  
Tel: (404) 881-8900  
Fax: (404) 881-3007  
[edoffermyre@dskd.com](mailto:edoffermyre@dskd.com)

Attorney for Plaintiffs

## **EXHIBIT B**

Friedman, Paula D.

**From:** O'Neil, Michael C;  
**Sent:** Friday, July 27, 2007 5:36 PM  
**To:** ccurtin659@aol.com; Friedman, Paula D.  
**Cc:** bryson@cloonlaw.com; bgrissom@sprintmail.com; mblanton@swansonmidgley.com; joyce@joyceyeagerlaw.com  
**Subject:** RE: Millett et al v. TrueLink Inc. Motion for Miscellaneous Relief

Joyce

This filing includes a signed statement by you that you conferred with counsel for TrueLink regarding the substance of this motion. Please advise immediately with whom you conferred and identify all "writings" relating to such conferences, as referenced in your certification. This motion comes as a complete surprise. I am unaware of any such conferring and, in any event, I am not sure why, even if you did, you would confer with TrueLink regarding obtaining information from Trans Union.

Michael O'Neil,  
DLA Piper US LLP - Chicago  
312.368.4098 [Direct]  
312.630.7319 [Fax]

**From:** ccurtin659@aol.com [mailto:[ccurtin659@aol.com](mailto:ccurtin659@aol.com)]  
**Sent:** Friday, July 27, 2007 5:25 PM  
**To:** Friedman, Paula D.; O'Neil, Michael C.  
**Cc:** bryson@cloonlaw.com; bgrissom@sprintmail.com; mblanton@swansonmidgley.com; joyce@joyceyeagerlaw.com  
**Subject:** Millett et al v. TrueLink Inc. Motion for Miscellaneous Relief

Counsel:

Attached is the Notice of electronic filing of the Motion for Steven Millett's Credit Report. The files are attached

Christopher J. Curtin, Esquire  
Erisman & Curtin  
P.O. Box 250  
Wilmington, DE 19899  
Tel: 302-478-5577  
Fax: 302-487-5494

This E-mail contains PRIVILEGED and CONFIDENTIAL INFORMATION intended only for the recipient named above. Please let me know immediately if you have received this in error.

-----Original Message-----

From: ded\_nesreply@ded.uscourts.gov  
To: ded\_ecf@ded.uscourts.gov  
Sent: Fri, 27 Jul 2007 6:12 pm  
Subject: Activity in Case 1:05-cv-00599-SLR Millett et al v. TrueLink Inc. Motion for Miscellaneous Relief

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\* You may view the filed documents once without charge. To avoid later charges, download a copy of each document during this first viewing.

**U.S. District Court  
District of Delaware**

**Notice of Electronic Filing**

The following transaction was entered by Curtin, Christopher on 7/27/2007 at 6:12 PM EDT and filed on 7/27/2007

**Case Name:** Millett et al v. TrueLink Inc.

**Case Number:** 1:05-cv-599

**Filer:** Steven G. Millett  
Melody J. Millett

**Document Number:** 121

**Docket Text:**

First MOTION Produce Credit Report - filed by Steven G. Millett, Melody J. Millett.  
(Attachments: # (1) # (2) Affidavit Melody Millett)(Curtin, Christopher)

**1:05-cv-599 Notice has been electronically mailed to:**

Christopher J. Curtin ccurtin659@aol.com

William M. Lafferty wlafferty@mnat.com, dchigges@mnat.com

**1:05-cv-599 Notice has been delivered by other means to:**

The following document(s) are associated with this transaction:

**Document description:** Main Document

**Original filename:** n/a

**Electronic document Stamp:**

[STAMP\_dcecfStamp\_ID=1079733196 [Date=7/27/2007] [FileNumber=421792-0]  
[118a3ac189b816c23dd3aecf762ed855228a973cedb94db955e809fda26f2194e664  
64959e39f71e52924afff779d9184f162c5db0fa0a57e01e241de4c51afc]]

**Document description:**

**Original filename:** n/a

**Electronic document Stamp:**

[STAMP\_dcecfStamp\_ID=1079733196 [Date=7/27/2007] [FileNumber=421792-1]  
[2f5d5a80c2bc652a9137bd399300b2ddaa6719b9c8a321f39c5997ed49df7fededa3  
6fb411d213129fb94b02bc3d59ca49c7d68ea205a5de10745126727a0de5]]

**Document description:** Affidavit Melody Millett

**Original filename:** n/a

**Electronic document Stamp:**

[STAMP\_dcecfStamp\_ID=1079733196 [Date=7/27/2007] [FileNumber=421792-2]]

[50accdbaaa0395283ce18f64d2b2a244aa37430c5cb230001fe7d7c7ce0649fa6243  
e1a3b1cccbde7043ac26ac9aeb8ef93aff94f26cca22afbb48b53068ed16]]

---

AOL now offers free email to everyone. Find out more about what's free from AOL at [AOL.com](http://AOL.com).